

**Federal Defenders
OF NEW YORK, INC.**

Southern District
52 Duane Street-10th Floor, New York, NY 10007
Tel: (212) 417-8700 Fax: (212) 571-0392

David E. Patton
Executive Director
and Attorney-in-Chief

Southern District of New York
Jennifer L. Brown
Attorney-in-Charge

May 20, 2021

Hon. Lorna G. Schofield
United States District Judge
40 Foley Square
New York, New York 10007

Re: United States v. Anthony Cruzado
20 CR 565 (LGS)

Dear Judge Schofield,

The Court has ordered that the parties jointly propose a motion deadline and by May 20, 2021. I write, with the consent of the government, to request an extension of the deadline for the filing of a letter regarding scheduling and an adjournment of the conference currently scheduled for May 27, 2021.

As discussed in the April 14th letter to the Court, Mr. has been transferred from Essex County Jail to the Bureau of Prisons. As anticipated, the transfer has led to greater access to and greater communication with Mr. Cruzado. However, Mr. Cruzado's medical incidents have continued. As of May 19, 2021, he was in an outside hospital and had been continuously since the beginning of May. Fortunately, Mr. Cruzado was able to receive and review most of the discovery prior to his transfer to the hospital. Since his transfer, he has been unable to receive additional documentation via mail and ease of communication with his attorney has again become limited.

There is additional documentation that the defense needs to receive and review with Mr. Cruzado prior to making decisions about potential motions. The defense is also awaiting a Pimentel letter from the government, which should be forthcoming within the next week. The parties request that the scheduling order be delayed and the May 27th conference been adjourned in order to allow the defense to continue to collect necessary information, to attempt to review that information with Mr. Cruzado and to review the Pimental with Mr. Cruzado. I request that the Court adjourn the May 27th conference and expand the deadline for the filing a scheduling order for one month to allow ongoing consultation with Mr. Cruzado.

The government requests that time be excluded to any new conference date and the defense has not objection to that request.

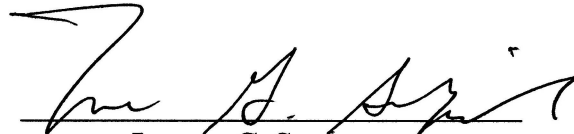
Thank you for your consideration of this request.

Respectfully submitted,
/s/
Jennifer E. Willis
Assistant Federal Defender
(212) 417-8743 / (917) 572-5792

Cc: AUSA Mitzi Steiner

Application Granted. The parties' joint scheduling letter shall be filed by **June 21 2021**. The status conference currently scheduled for May 27, 2021, is adjourned to **July 8, 2021, at 4:15 p.m.** For the reasons stated above, the Court finds that the ends of justice served by excluding the time between today and July 8, 2021, outweigh the best interests of the public and the Defendant in a speedy trial as provided in 18 U.S.C. 3161(h)(7)(A). The time between today and July 8, 2021, is hereby excluded. The Clerk of the court is directed to terminate the letter motion at docket number 22.

Dated: May 21, 2021
New York, New York



LORNA G. SCHOFIELD
UNITED STATES DISTRICT JUDGE